US ERA ARCHIVE DOCUMENT

C'mestry Branch

June 18, 1971

Sili. pptoF0906

Mr. Taylor W. Hanavan Legal Department E. I. Du Pont De Hemours & Company Wilmington, Deleware 19898

Dear Mr. Hanavan:

This refers to the fungicide benomyl and the conference we had with Mr. Rosen, Dr. Stula and Dr. Lee April 27, 1971.

As we advised in that conference, new petitions for benomyl in addition to pending petitions (\$60906), 0\$1000, 1\$1033 and 1\$1045, will require a detailed histopathology examination and report including fat stains on liver and iron stains on bone marrow from the dogs fed for two years at 500 parts per million and 100 parts per million. Toxicity data so far submitted on benomyl support a "no-effect level" for benomyl which may be sufficient to assure safety of the tolerances requested in the listed pending petitions. We noted in the conference, however, the desirability of further histopathologic studies in order to show whether the "no-effect level" may actually be greater than our minimal estimate. For assurance of safety of further tolerances on benomyl, our toxicologists and pathologists find that we need these additional studies.

The pending petition 171145 which proposes a tolerance of 3 p.p.m. for residues of benomyl on celery is affected by this requirement. Future petitions will also be affected by this requirement.

In response to a request from Mr. D. E. Rosen we are enclosing a copy of tolerances for meet, milk, poultry and eggs established during the period January 1, 1970 to May 17, 1971.

Sincerely yours,

JUN 2 1 1931

Drew M. Baker, Jr., Chief Petitions Control Branch

Enclosure

ce: PRD. EPA

PTD, Chemistry Branch, Toxicology Branch, OGFitzhugh PP Nos. OF1000, 1F1010, 1F1033, 1F1045, 1F1145 and 0F0906

DMBaker:ea 6/18/71-6/7/71:ggr 5/26/71 R/D Init:OGFitzhugh, FJMcFarland 6/8/71